

**IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN
DISTRICT OF PENNSYLVANIA**

**In re: TATYANA MAZIK,
Debtor**

: CHAPTER 13

: BANKRUPTCY NO. 18-10643

ORDER

AND NOW, this day of July, 2018, upon consideration of the Motion of Chicago Title Insurance Company for Extension of Time to File Proof of Claim, and Objection to Plan, and the Debtor's Answer with Affirmative Defenses thereto, and after notice and an opportunity to be heard by all interested parties, it is hereby ORDERED that the Motion is DENIED.

J.

**-IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN
DISTRICT OF PENNSYLVANIA**

**In re: TATYANA MAZIK,
Debtor**

: CHAPTER 13

: BANKRUPTCY NO. 18-10643

**DEBTOR'S ANSWER TO MOTION OF CHICAGO TITLE INSURANCE COMPANY
FOR EXTENSION OF TIME TO FILE PROOF OF CLAIM AND OBJECTION TO
PLAN, WITH AFFIRMATIVE DEFENSES**

1. The allegations of paragraphs 4, 5, and 7 of the Motion are admitted
2. The allegations of all of the remaining paragraphs are denied or denied as stated and strict proof of same is demanded at any hearing.

AFFIRMATIVE DEFENSES

3. The Movant failed to file a proof of claim in this case by the established bar date of April 10, 2018.

4. Despite the Movant's statements to the contrary, and the total lack of merit of the Movant's underlying claims, the Debtor, due to the filing of a similar meritless claim in the Debtor's prior Chapter 7 case, did schedule the Movant's claim as an unsecured, disputed, unliquidated claim in this case and included the Movant on the Mailing Matrix in this case. As a result, the Movant was served with a copy of the Debtor's Motion to extend the automatic stay in this case and was conclusively presumably served by the Clerk's office with notice of the Meeting of Creditors and applicable deadlines in this case. The Movant fails to allege any wrongful conduct by the Debtor or any other party which justified the untimely filing.

5. Despite the recitation in the Motion of a filing in this court at "Docket No. 18-1116," no such docket number or filing appears of record in this court.

6. There is no allegation of any entry of any judgment entered against the Debtor as a result of any of the events at issue, and the allegations of wrongdoing in the

Complaint relate almost entirely to the Debtor's husband, and not to the Debtor herself.

7. All of the events described in the Motion and the Complaint allegedly occurred over ten years ago, and hence any claims of any kind asserted against the Debtor are barred by limitations, assuming arguendo that the Movant alleged any claims against the Debtor which had any merit.

WHEREFORE, the Debtor requests that this court deny the Motion.

Dated: June 10, 2018

Attorney for Debtor

/s/DAVID A. SCHOLL
512 Hoffman Street
Philadelphia, PA. 19148
610-550-1765